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Co-Lead/Liaison Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

**IN RE: BARD IVC FILTERS
 PRODUCTS LIABILITY LITIGATION**

MD No. 02641

**NOTICE OF SUBMISSION OF
 AMENDED CASE MANAGEMENT
 ORDER NO. 4 RE: MASTER
 COMPLAINT, MASTER
 RESPONSIVE PLEADING, USE OF
 SHORT FORM COMPLAINT,
 WAIVER OF SERVICE FOR BARD
 DEFENDANTS, AND ANSWER AND
 GENERAL DENIAL IN CASES
 SUBSEQUENTLY TRANSFERRED
 TO MDL 2641**

As discussed at the Court's January 29, 2016, Case Management/Status Conference, Plaintiffs' Co-Lead/Liaison Counsel submit a proposed form of Amended Case Management Order No. 4, to address the Master Complaint, Master Responsive Pleading, use of Short Form Complaint, waiver of service for Bard Defendants, and answer and general denial in cases subsequently transferred to MDL 2641. The form of order and attached Amended Short Form Complaint are agreed and stipulated to by the parties.

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1 DATED this 23rd day of February, 2016.

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3 **GALLAGHER & KENNEDY, P.A.**

4 By: /s/ Robert W. Boatman

5 Robert W. Boatman

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11 *Co-Lead/Liaison Counsel for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Nancy Jo Koenes

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